

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|---------------------------|---|------------------------------------|
| UNITED STATES OF AMERICA, |) | CASE NO.: 1:16CR308 |
| |) | |
| Plaintiff, |) | JUDGE SOLOMON OLIVER, JR. |
| |) | |
| v. |) | |
| |) | |
| JAMES CARVER, and |) | |
| JUAN CARLOS SOLIS |) | |
| |) | <u>JOINT PRELIMINARY STATEMENT</u> |
| Defendants. |) | |

The United States of America, by and through its attorneys, Justin E. Herdman, United States Attorney, and Marisa T. Darden and Robert F. Corts, Assistant United States Attorneys, and defense attorneys Joseph P. Morse, counsel for James Carver, and Craig T. Weintraub, counsel for Juan Carlos Solis hereby jointly state that the following is an accurate preliminary statement:

The Government alleges that the defendants, James Carver and Juan Carlos Solis conspired to possess with the intent to distribute and to distribute controlled substances, including heroin and fentanyl, beginning as early as January 1, 2010, and continuing through September 28, 2016.

Specifically, the Government alleges that Carver conspired with Alfonso Rodrigo, David Urrabazo Maldonado, and others, to deliver a quantity of fentanyl from New York to a residence in the city of Maple Heights, Ohio, which is in the Northern District of Ohio, on or about March 20, 2016. Carver denies that he did this. The Government further alleges that Carver utilized a

cell phone to coordinate the delivery of fentanyl to Ohio from New York. Carver denies that he did this and denies his involvement in the incident.

The Government alleges that Solis, along with his father, Jose Hernandez, traveled on a Megabus from Chicago, Illinois, to Cleveland, Ohio, to deliver approximately 2 kilograms of heroin to Ismael Acosta. Solis denies his involvement in the incident.

Respectfully submitted,

JUSTIN E. HERDMAN
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of March, 2018, a copy of the foregoing JOINT PRELIMINARY STATEMENT was filed electronically.

s/ Marisa T. Darden

Marisa T. Darden
Assistant U.S. Attorney